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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 ERIC D. WHITED, and  
D-2 DOMINIQUE P. FRALEY,

Defendants.

Case: 4:23-cr-20358  
Judge: Kumar, Shalina D.  
MJ: Ivy, Curtis  
Filed: 06-21-2023  
INDI USA v. Eric Whited, et al (tt)

**F I L E D**  
JUN 21 2023

Violations: U.S. DISTRICT COURT  
18 U.S.C. § 924(o) FLINT, MICHIGAN  
18 U.S.C. § 922(g)(1)

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**INDICTMENT**

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**THE GRAND JURY CHARGES:**

**COUNT ONE**  
**CONSPIRACY TO CARRY A FIREARM**  
**DURING AND IN RELATION TO A DRUG TRAFFICKING CRIME**  
**18 U.S.C. § 924(o)**

D-1 ERIC D. WHITED  
D-2 DOMINIQUE P. FRALEY

On or about May 11, 2023, in the Eastern District of Michigan, ERIC D. WHITED and DOMINIQUE P. FRALEY knowingly and unlawfully combined, conspired, confederated, and agreed with each other to carry a firearm, that is, a Rock Island Armory, Model 1911A1, .45 caliber, semi-automatic pistol, during and in relation to a drug trafficking crime for which they may be prosecuted in a court

of the United States, that is, possession with intent to distribute cocaine base, in violation of Title 21, United States Code, Section 841(a).

All in violation of Title 18, United States Code, Section 924(o).

**COUNT TWO**  
**FELON IN POSSESSION OF A FIREARM**  
**18 U.S.C. §§ 922(g)(1) AND 2**

D-1 ERIC D. WHITED  
D-2 DOMINIQUE P. FRALEY

On or about May 11, 2023, in the Eastern District of Michigan, aided and abetted by DOMINIQUE P. FRALEY, ERIC D. WHITED, knowing he had been previously convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Rock Island Armory, Model 1911A1, .45 caliber, semi-automatic pistol, in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT THREE**  
**FELON IN POSSESSION OF A FIREARM**  
**18 U.S.C. § 922(g)(1)**

D-2 DOMINIQUE P. FRALEY

On or about September 17, 2022, in the Eastern District of Michigan, DOMINIQUE P. FRALEY, knowing he had been previously convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in

and affecting commerce, a firearm, that is, an SCCY Industries, 9mm caliber, semi-automatic pistol, in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FOUR**  
**FELON IN POSSESSION OF A FIREARM**  
**18 U.S.C. § 922(g)(1)**

D-2 DOMINIQUE P. FRALEY

On or about November 22, 2020, in the Eastern District of Michigan, DOMINIQUE P. FRALEY, knowing he had been previously convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Taurus, Model G4, 9mm caliber, semi-automatic pistol, in violation of Title 18, United States Code, Section 922(g)(1).

**FORFEITURE ALLEGATIONS**  
**18 U.S.C. § 924(d)(1)**

The allegations contained in Counts One, Two, Three, and Four of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1).

Upon conviction of an offense charged in Counts One, Two, Three, and Four of this Indictment, ERIC D. WHITED and DOMINIQUE P. FRALEY shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), any firearm or ammunition involved in said offense including, but not limited to, a Rock Island Armory, Model 1911A1, .45 caliber, semi-automatic pistol; an SCCY

Industries, 9mm caliber, semi-automatic pistol; and a Taurus, Model G4, 9mm caliber, semi-automatic pistol.

**THIS IS A TRUE BILL.**

Dated: June 21, 2023

s/GRAND JURY FORPERSON  
GRAND JURY FOREPERSON

DAWN N. ISON  
United States Attorney

s/ANTHONY P. VANCE  
ANTHONY P. VANCE  
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P61148

**Companion Case information MUST be completed by AUS**United States District Court  
Eastern District of Michigan**Criminal Case Cover**Case: 4:23-cr-20358  
Judge: Kumar, Shalina D.  
MJ: Ivy, Curtis  
Filed: 06-21-2023  
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	<b>Judge Assigned:</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials:</b> AV

Case Title: USA v. Dominique Fraley et. al.County where offense occurred : GeneseeCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty       Indictment/        Information --- no prior complaint.  X   Indictment/        Information --- based upon prior complaint [Case number: 23-mj-30193]       Indictment/        Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Original case was terminated; no additional charges or defendants.  
☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

June 21, 2023

Date

s/ANTHONY P. VANCE

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P61148

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.